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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

WRITER'S DIRECT DIAL
(202) 828-9479

Hon. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

Re: Mobile Telecommunication Technologies Corp.
Petition for Rulemaking to Amend Rule Section 22.521
to include San Luis Obispo, California in the Table
of Assignments for Air-Ground Stations in the PLMS

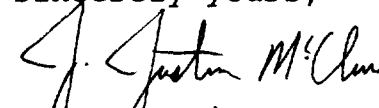
Attn: Andy Nachby
Room 644

Dear Mr. Caton:

On behalf of Mobile Telecommunication Technologies Corp.,
please find enclosed for filing an original and four (4) copies of
its above referenced Petition for Rulemaking.

Should any questions arise with respect to this matter, please
contact undersigned counsel directly.

Sincerely yours,



Thomas Gutierrez
J. Justin McClure

JM:cms
Enclosure

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**FEDERAL COMMUNICATIONS COMMISSION
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Amendment of Section 22.521(b) of the Commission's Rules to include San Luis Obispo, California, in the table of assignments for air-ground stations in the Public Land Mobile Service

RM No.

^{1/} This service is distinct and separate from the nationwide 800 MHz air-ground service available on commercial flights.

the base frequencies to specific geographic locations. That subsection requires that base stations operating on these frequencies be within 25 miles of the coordinates of the location specified.

San Luis Obispo is not among the locations listed in Section 22.521(b), nor is it within 25 miles of any of the locations so specified. As a result, air-ground service is not presently available in this community. Yet, as set forth below, there is a true need for such service and the service can be provided without risking interference to presently authorized facilities, and without otherwise being inconsistent with the Commission's rules.

II. The Need For Service

San Luis Obispo is the principal municipality within the metropolitan area having the same name and a 1990 population of 217,162. It is a center of commercial activity as well as the location of significant general aviation activity. San Luis Obispo is a major metropolitan area connecting San Francisco, California and points north with Los Angeles, California, and points south. Thus, this community is a center of commerce, as well as being located on a primary flight route separating other hub cities on the west coast.

III. Proposed Amendment

Notwithstanding the clear need for service, there are no authorized air-ground stations within 61 miles of San Luis Obispo. In order to cure this shortcoming, Mtel proposes that Section

22.521(b) be amended to add the following:

<u>Location</u>	<u>Channel</u>
California	
San Luis Obispo	12

This amendment would allow an air-ground station to be operated, after proper authorization, on the working frequency of 454.975 MHz (Channel 12) and 454.675 (the nationwide signalling channel) within 25 miles of San Luis Obispo.

Petitioner has selected Channel 12 for the proposed amendment to afford maximum co-channel separation from all other air-ground stations allocated by Section 22.521(b). Significantly, the closest co-channel facility to San Luis Obispo is located 476 miles away in Klamath Falls, Oregon. This degree of separation has already been found to be more than sufficient to warrant allocation of additional air-ground facilities.^{2/} Modification of the Table of Assignments as set forth herein would also be consistent with other Commission action where it has held that there is a need for quality air-ground communications in cities not currently being served. See, e.g., Air-Ground Radiotelephone Service (Table of Assignments), 6 FCC Rcd 1863 (1991), where the Commission allocated spectrum for air ground service in Fort Myers, Florida; Wilmington, North Carolina; and Columbia, Missouri.

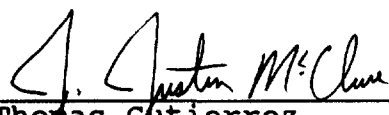
^{2/} See, e.g., Report and Order allocating spectrum for air-ground service in Mobile, Alabama in Docket No. 84-1295, 50 FR 23125 (effective July 1, 1985).

IV. Conclusion

In view of the above, Mtel submits that revision of the Commission's rules to allocate spectrum for air-ground at San Luis Obispo, California would serve the public interest, convenience and necessity. Accordingly, Mtel respectfully petitions the Commission to modify its rules in accordance with the proposal set forth above.

Respectfully submitted,

**MOBILE TELECOMMUNICATION
TECHNOLOGIES CORP.**

By: 

Thomas Gutierrez
J. Justin McClure

Its Attorneys

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